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NOTES OF CASES.

RESULTING TRUST—TENANT FOR LIFE ACQUIRING REMAINDER BY TAX TITLE.—A tenant for life in possession of real estate is held, in *Hanna v. Palmer* (Ill.), 56 L. R. A. 93, not to be able to obtain an absolute title to the property, either directly or indirectly, by suffering it to be sold for taxes, and then acquiring a tax title.

EMINENT DOMAIN—SPUR TRACK TO REACH A PARTICULAR INDUSTRY.—That the purpose of taking land by a railroad company for a spur track is merely to reach a particular industry and connect it with the markets along the road, is held, in *Re Chicago & N. W. R. Co.* (Wis.), 56 L. R. A. 240, not to prevent the legislature from declaring it to be a public one, for which the power of eminent domain may be employed.

CONFLICT OF LAWS—PENAL LAWS—ACTIONS FOR DEATH.—A statute fixing a maximum and minimum fine, to be recovered by indictment, as a penalty against a railroad company for negligently killing a passenger, which shall be paid to the executor for the use of the widow and child, or next of kin, is held, in *Boston & M. R. R. v. Hurd* (C. C. A. 1st C.), 56 L. R. A. 193, not to be so strictly penal that it cannot be enforced in other jurisdictions.

With this case is a note reviewing the authorities on conflict of laws as to action for death or bodily injury.

CONFLICT OF LAWS—TELEGRAPH COMPANIES—DAMAGES FOR MENTAL ANGUISH.—That a contract for the transmission of a telegram is made in a State the laws of which do not allow damages for mental anguish for its breach, is held, in *Gray v. West. U. Tel. Co.* (Tenn.), 56 L. R. A. 301, not to prevent a recovery of such damages for neglecting to promptly deliver it in a State whose statutes make such neglect a public offense, subjecting the offender to liability for the injuries thereby caused, and whose courts permit the consideration of mental anguish in fixing the damages.

A note to this case collects the authorities on conflict of laws as to measure of damages.

PRINCIPAL AND AGENT—NOTICE TO AGENT, WHEN REPRESENTING ADVERSE INTERESTS—NOTICE OF INFIRMITIES IN PAPER.—A bank purchased a note from a corporation which had received it without consideration. In an action by the bank upon the note, the maker sought to prove notice to the bank by showing that the cashier of the bank was also president of the corporation, and that he knew of the lack of consideration. *Held*, that the bank was not bound with such notice. *Bank v. Hine* (Mich.), 91 N. W. 130. Citing *Bank v. Montgomery*, 126 Mich. 327. *Innerarity v. Bank*, 139 Mass. 332, 52 Am. Rep. 710. See *Martin v. So. Salem Land Co.*, 94 Va. 28.